

15

UNION ELECTRIC COMPANY
1901 GRATIOT STREET-ST. LOUIS

Steve Busch
MDD000805499

March 8, 1984

MAILING ADDRESS:
P.O. BOX 149
ST. LOUIS, MO. 63166

Mr. David A. Wagoner
Director, Air and Waste Mgt. Division
U.S. EPA Region VII
324 East 11th Street
Kansas City, Missouri 64106

Dear Mr. Wagoner:

On January 20, 1983 Mr. Morris Kay, Regional Administrator, EPA Region VII granted approval to Union Electric Company pursuant to section 6(e) of the Toxic Substances Control Act and 40CFR 761.60(e) of the Federal PCB regulations to dispose of 5% PCBs in mineral oil at its Labadie Unit No.4 high efficiency boiler. This approval was based on the Agency's stated belief that the disposal method described did not present risk of injury to health or the environment and provided PCB destruction equivalent to an incinerator meeting the requirements of 40CFR 761.70.

Recently a question has been raised regarding the specifics of the conditions of that approval. Condition 6 grants Union Electric the right to accept mineral oil dielectric less than 500 ppm PCBs from others for purposes of blending with our askarel to achieve the 5% PCB concentration for disposal. A potential source of blend stock mineral oil recently called to notify us that they had approximately 16,000 gallons of dielectric oil which due to a mix up in PCB analysis identification had been inadvertently mixed with a small quantity of dielectric containing greater than 500 ppm PCBs. Although the resultant total mixture was considerably less than 500 ppm, regulations require that they treat the entire quantity as if it were greater than 500 ppm. They inquired whether or not we could accept this material and it was agreed that we would seek guidance from EPA Region VII.

Union Electric fully understands and appreciates EPA's position that dilution to circumvent more stringent regulatory disposal requirements is unacceptable. However, with regard to this request, there are several pertinent points which should be recognized.



R00136567

RCRA RECORDS CENTER

EPA-ARWM/WMBR

MAR 13 1984

Region VII K.C., MO

RECEIVED

MAR 12 1984

AIR AND WASTE
STANCH

- a. Union Electric has approval to accept and dispose of mineral oil dielectric with less than 500 ppm PCBs. The oil in question fits this description.
- b. Union Electric has demonstrated equivalence to an incinerator meeting the requirements of 40CFR 761.70 when burning 5% PCBs and has demonstrated no risk of injury to health or the environment. The demonstrated PCB destruction efficiency is 99.99999%.
- c. This disposal alternative proposes a cost effective solution which further encourages strict compliance with the regulations.

Please review the circumstances of this request and provide guidance as appropriate. Your cooperation is appreciated.

Sincerely,



Thomas E. Siedhoff, P.E.
Assistant Manager
Environmental Services

TES/mtn

cc: Stephen P. Busch

UNION ELECTRIC COMPANY
1901 GRATIOT STREET-ST. LOUIS

March 8, 1984

MAILING ADDRESS:
P.O. BOX 149
ST. LOUIS, MO. 63166

Mr. David A. Wagoner
Director, Air and Waste Mgt. Division
U.S. EPA Region VII
324 East 11th Street
Kansas City, Missouri 64106

EPA-ARWM/WMBR
MAR 12 1984
Region VII K.C., MO

Dear Mr. Wagoner:

On January 20, 1983 Mr. Morris Kay, Regional Administrator, EPA Region VII granted approval to Union Electric Company pursuant to section 6(e) of the Toxic Substances Control Act and 40CFR 761.60(e) of the Federal PCB regulations to dispose of 5% PCBs in mineral oil at its Labadie Unit No.4 high efficiency boiler. This approval was based on the Agency's stated belief that the disposal method described did not present risk of injury to health or the environment and provided PCB destruction equivalent to an incinerator meeting the requirements of 40CFR 761.70.

Recently a question has been raised regarding the specifics of the conditions of that approval. Condition 6 grants Union Electric the right to accept mineral oil dielectric less than 500 ppm PCBs from others for purposes of blending with our askarel to achieve the 5% PCB concentration for disposal. A potential source of blend stock mineral oil recently called to notify us that they had approximately 16,000 gallons of dielectric oil which due to a mix up in PCB analysis identification had been inadvertently mixed with a small quantity of dielectric containing greater than 500 ppm PCBs. Although the resultant total mixture was considerably less than 500 ppm, regulations require that they treat the entire quantity as if it were greater than 500 ppm. They inquired whether or not we could accept this material and it was agreed that we would seek guidance from EPA Region VII.

Union Electric fully understands and appreciates EPA's position that dilution to circumvent more stringent regulatory disposal requirements is unacceptable. However, with regard to this request, there are several pertinent points which should be recognized.

- a. Union Electric has approval to accept and dispose of mineral oil dielectric with less than 500 ppm PCBs. The oil in question fits this description.
- b. Union Electric has demonstrated equivalence to an incinerator meeting the requirements of 40CFR 761.70 when burning 5% PCBs and has demonstrated no risk of injury to health or the environment. The demonstrated PCB destruction efficiency is 99.99999%.
- c. This disposal alternative proposes a cost effective solution which further encourages strict compliance with the regulations.

Please review the circumstances of this request and provide guidance as appropriate. Your cooperation is appreciated.

Sincerely,

Thomas E. Siedhoff
Thomas E. Siedhoff, P.E.
Assistant Manager
Environmental Services

TES/mtn

cc: ✓ Stephen P. Busch

UNION ELECTRIC COMPANY
P. O. BOX 149
ST. LOUIS, MISSOURI 63166

FORM 46
REV. 1-67



Mr. David A. Wagoner
Director, Air and Waste Mgt. Div.
U.S. EPA, Region VII
324 East 11th Street
Kansas City, MO 64106

